

EXHIBIT 2

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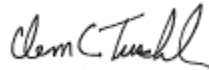
Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*
USDC, District of New Jersey, No. 1:19-md-2875

Dear Adam:

On behalf of the Defendants' Executive Committee, I am writing in furtherance of the meet-and-confer process contemplated by the Court concerning case management issues in the *Valsartan* MDL. On several occasions, Plaintiffs have solicited Defendants' input regarding the claims and causes of action to be worked up for trial, as well as the discovery Defendants would contemplate taking in advance of Rule 56 deadlines. Based on numerous statements made by Judge Kugler at both the June 1 case management conference and on prior occasions, it is Defendants' expectation that the Court intends the first trial to involve a third-party payor (TPP) Plaintiff proceeding in its individual capacity. As such, I am enclosing Rule 34 requests for the production of documents directed to the two individual TPP plaintiffs who have been involved in Plaintiffs' master pleadings and have already been subject to Rule 23 discovery in the MDL. Defendants believe timely responses to this discovery are necessary in order to prepare Defendants' supplemental expert disclosures and dispositive motions.

Please let us know when you are available to continue our discussion of these issues in advance of the end-of-month conference with Judge Kugler.

Very truly yours,



Clem C. Trischler

Encls.

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